1	GARMAN TURNER GORDON LLP	MICHAEL D. NAPOLI, ESQ.
l	GERALD M. GORDON	Pro hac vice
2	Nevada Bar No. 229 E-mail: ggordon@gtg.legal	AKERMAN LLP 2001 Ross Avenue, Suite 3600
3	WILLIAM M. NOALL	Dallas, Texas 75201
4	Nevada Bar No. 3549 E-mail: <u>wnoall@gtg.legal</u>	Tel: (214) 720-4360 / Fax: (214) 720-8116 Email: michael.napoli@akerman.com
5	JARED SECHRIST Nevada Bar No. 10439	ARIEL E. STERN, ESQ. Nevada Bar No. 8276
6	E-mail: jsechrist@gtg.legal	AKERMAN LLP
7	7251 Amigo St., Suite 210 Las Vegas, Nevada 89119	1635 Village Center Circle, Suite 200
8	Tel: (725) 777-3000 / Fax: (725) 777-3112	Las Vegas, Nevada 89134 Tel: (702) 634-5000 / Fax: (702) 380-8572 Email: ariel.stern@akerman.com
9	Attorneys for Tecumseh–Infinity Medical	Eman. arier.stern@akerman.com
10	Receivable Fund, LP	
11	UNITED STATES BANKRUPTCY COURT	
12 12	DISTRICT OF NEVADA	
13		
02) :: 14	In re:	Case No.: 21-14486-abl
12 TET:: (702) 634-5000 - FAX: (703) 380-8272 15 16 17 17 18	INFINITY CAPITAL MANAGEMENT, INC.	Chapter 7
16 16	Debtor.	Adversary Case No. 21-01167-abl
202): 17	HAGELECT MEDICAL DECENTABLES	NOTICE OF REMOTE HEARING
18 IE	HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND	REGARDING TECUMSEH-INFINITY
	INTERNATIONAL SP,	MEDICAL RECEIVABLE FUND, LP MOTION FOR
19	Plaintiff,	PARTIAL SUMMARY JUDGMENT AS
20	Trainerri,	TO DIRECT PURCHASE RECEIVABLES [ECF 90]
21	v.	RECEIVABLES [ECF 90]
22	TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP,	
23		
24	Defendant.	Date: October 25, 2022
		Time: 1:30 p.m.
25	TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP,	
26		
27	Counter-Claimant,	
28	v.	

65410923;9

AKERMAN LLP

2 3

1

4

5 6

7

8

9

10

11

12 13 14

1635 VILLAGE CENTER CIRCLE, SUITE 200 LAS VEGAS, NEVADA 89134 TEL.: (702) 634-5000 – FAX: (702) 380-8572 15 16

17 18 19

20

22 23

21

24

25

26

27

28

HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND INTERNATIONAL SP,

Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES LITIGATION FINANCE FUND INTERNATIONAL SP,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL RECEIVABLES FUND, LP,

Counter-Defendant.

## NOTICE OF HEARING REGARDING MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO DIRECT PURCHASE RECEIVABLES [ECF 90]

**NOTICE IS GIVEN** that a Motion for Partial Summary Judgment as to Direct Purchase Receivables ("Motion") was filed on August 26, 2022, by Tecumseh-Infinity Medical Receivable Fund, LP ("Tecumseh") by and through counsel. [ECF 90] The Motion seeks the following relief: an order granting partial summary judgment in Tecumseh's favor, ruling: (i) Tecumseh to be the equitable owner of the Direct Purchase Receivables (defined in the Motion); (ii) the Direct Purchase Receivables are not and were never property of the bankruptcy estate of Infinity Capital Management, Inc. ("Infinity" or "Debtor"); (iii) the perfected security interest of HASelect's-Medical Receivables Litigation Finance Fund International SP ("HASelect") in the Debtor's collateral does not extend to the Direct Purchase Receivables; and (iv) the strong arm rights and powers afforded to the Trustee under 11 U.S.C. § 544 and sold to HASelect should not, and indeed cannot, be utilized to make the Direct Purchase Receivables property of the Debtor's bankruptcy estate.

**NOTICE IS FURTHER GIVEN** that if you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you must file an opposition with the Court, and serve a copy on the person making the Motion. The opposition must state your position, set forth all relevant facts and legal authority, and be supported by affidavits

## Case 21-01167-abl Doc 93 Entered 08/31/22 15:43:18 Page 3 of 4

AKERMAN LLP

or declarations that conform to Local Rule 9014(c). Pursuant to Local Rule 7056, "an opposing party has twenty-one (21) days after service of the moving party's points and authorities to file and serve a memorandum of points and authorities in opposition to the motion."

**NOTICE IS FURTHER GIVEN** that pursuant to Administrative Order 2020-14, all hearings are currently being held telephonically absent further order of the Court. The hearing will be held on October 25, 2022, at 1:30 p.m. Parties are permitted to appear telephonically by dialing (888) 684-8852 and entering access code or passcode 8242009#.

If you intend to participate at this hearing, please check the Court's website prior to the hearing for any updated instructions relating to the court participation number and access code. You may view

## Case 21-01167-abl Doc 93 Entered 08/31/22 15:43:18 Page 4 of 4

1 the Court Calendar at: https://www.nvb.uscourts.gov/calendars/court-calendars/. Select the hearing 2 judge. Next click on the "calendar date" to view the hearing judge's dial-in number and meeting 3 access codes. 4 Dated this 31st day of August, 2022. GARMAN TURNER GORDON LLP 5 By: /s/William M. Noall 6 GERALD M. GORDON, ESQ. 7 WILLIAM M. NOALL, ESQ. JARED SECHRIST, ESQ, 8 7251 Amigo St., Suite 210 Las Vegas, Nevada 89119 9 and 10 11 MICHAEL D. NAPOLI, ESQ. 1635 VILLAGE CENTER CIRCLE, SUITE 200 LAS VEGAS, NEVADA 89134 TEL.: (702) 634-5000 – FAX: (702) 380-8572 Pro hac vice 12 AKERMAN LLP 2001 Ross Avenue, Suite 3600 13 Dallas, Texas 75201 Tel: (214) 720-4360 / Fax: (214) 720-8116 15 ARIEL E. STERN, ESQ. Nevada Bar No. 8276 16 AKERMAN LLP 1635 Village Center Circle, Suite 200 17 Las Vegas, Nevada 89134 Tel: (702) 634-5000 / Fax: (702) 380-8572 18 Email: ariel.stern@akerman.com 19 Attorneys for Tecumseh–Infinity Medical Receivable 20 Fund, LP 21 22 23 24 25 26 27

28